UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Case No.: 13-cv-6704-RA

In re: L&L ENERGY, INC. SECURITIES

LITIGATION

This Document Relates To: All Actions

LEAD PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR (1) FINAL APPROVAL OF PROPOSED CLASS ACTION SETTLEMENT; AND (2) AN AWARD OF COUNSEL FEES, REIMBURSEMENT OF EXPENSES, AND AN AWARD TO LEAD PLAINTIFFS

PLEASE TAKE NOTICE that Lead Plaintiffs Robert Leonard and Gregg Irvin ("Lead Plaintiffs") will and hereby do move the Court, for final approval of the proposed class action settlement and an award of counsel fees, reimbursement of expenses, and award to Lead Plaintiffs.

This motion is based upon this notice of motion and motion, the accompanying memorandum of law, the accompanying declaration of Phillip Kim in support of the motion, the exhibits attached thereto, and such argument and additional papers as may be submitted to the Court before and at the hearing on this motion.

Dated: May 22, 2015

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Phillip Kim

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Lead Counsel for Plaintiffs and the Class

CERTIFICATE OF SERVICE

I hereby certify that on this on the 22nd day of May, 2015, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Phillip C. Kim